

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
TRENTON VICINAGE**

ASSOCIATION OF NEW JERSEY RIFLE
& PISTOL CLUBS, INC., BLAKE
ELLMAN, and MARC WEINBERG,

Plaintiffs,

v.

MATTHEW PLATKIN, in his official
capacity as Attorney General of New Jersey,
PATRICK J. CALLAHAN, in his official
capacity as Superintendent of the New
Jersey Division of State Police,
RYAN MCNAMEE, in his official capacity
as Chief of Police of the Chester Police
Department, and
JOSEPH MADDEN, in his official capacity
as Chief of Police of the Park Ridge Police
Department,

Defendants.

HON. PETER G. SHERIDAN

Civil Action No.
3:18-cv-10507

(ELECTRONICALLY FILED)

**NOTICE OF MOTION TO
EXCLUDE THE EXPERT
TESTIMONIES OF EMANUEL
KAPELSOHN AND CLAYTON
CRAMER**

Motion Return Date: December 4, 2023

MARK CHEESEMAN, TIMOTHY
CONNELLY, and FIREARMS
POLICY COALITION, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his
official capacity as Acting Attorney
General of New Jersey, PATRICK J.
CALLAHAN, in his official capacity
as Superintendent of the New Jersey

HON. RENEE M. BUMB

Civil Action No.
1:22-cv-4360

State Police, CHRISTINE A. HOFFMAN, in her official capacity as Acting Gloucester County Prosecutor, and BRADLEY D. BILLHIMER, in his official capacity as Ocean County Prosecutor,

Defendants.

BLAKE ELLMAN, THOMAS R. ROGERS, and ASSOCIATION OF NEW JERSEY RIFLE & PISTOL CLUBS, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his official capacity as Attorney General of New Jersey, PATRICK J. CALLAHAN, in his official capacity as Superintendent of the New Jersey Division of State Police, LT. RYAN MCNAMEE, in his official capacity as Officer in Charge of the Chester Police Department, and KENNETH BROWN, JR., in his official capacity as Chief of the Wall Township Police Department,

Defendants.

HON. PETER G. SHERIDAN

Civil Action No.
3:22-cv-04397

TO: Clerk of Court, United States District Court
District of New Jersey – Trenton Vicinage
402 East State Street
Trenton, New Jersey 08608

All counsel of record (via CM/ECF)

PLEASE TAKE NOTICE that on December 4, 2023, or as soon thereafter as counsel may be heard, Matthew J. Platkin, Attorney General of New Jersey, by Assistant Attorney General Daniel M. Vannella, appearing on behalf of Defendants, Matthew J. Platkin, Patrick J Callahan, Christine A. Hoffman, and Bradley D. Billhimer (collectively, “State Defendants”), pursuant to Federal Rule of Evidence 702 and Federal Rule of Civil Procedure 26(e)(1)(A), shall move before the United States District Court for the District of New Jersey for an Order to exclude the expert testimonies of Emanuel Kapelsohn and Clayton Cramer.

PLEASE TAKE FURTHER NOTICE that the undersigned will rely on the attached Brief, and Declaration of Daniel M. Vannella with exhibits (filed separately), in support of the motion.

PLEASE TAKE FURTHER NOTICE that the undersigned respectfully requests oral argument pursuant to Federal Rule of Civil Procedure 78. A proposed form of Order is attached hereto.

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Daniel M. Vannella
Daniel M. Vannella
Assistant Attorney General

Dated: November 3, 2023